

EXHIBIT A

July 13, 2021

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1 S. Herrmann	1 S. Herrmann
2 A I don't know.	2 Q What's the nature of Gecht's involvement
3 Q Did you have any conversations with	3 in this process?
4 Ms. McGeary directly or any communications	4 A He likely would have just been made
5 about Maltman?	5 aware of any proposed accommodation that, as
6 A I can't recall if the concern was raised	6 the people's representative, I would have
7 with Robynn or from Sabrina. I believe that I	7 presented to the business.
8 had at least some communication with Sabrina	8 Q Why would he have been made aware?
9 directly, but I can't recall specifically.	9 A It would be normal to include the
10 Q Are you aware of any conversations that	10 general manager and the regional director
11 Sabrina had with anyone else or any	11 overseeing that, of some type of schedule
12 communications that she had with anyone else,	12 accommodation associated with a manager level
13 other than Robynn, perhaps?	13 position.
14 A No, not that I know of.	14 Q What was Gecht's involvement in general
15 Q Now, when we were discussing Robynn's	15 with respect to the manager level employees?
16 scheduling accommodations earlier, you	16 A In his role, he was responsible for the
17 testified that you might have spoken with Adam	17 general oversight and operations of day-to-day
18 Gecht about those scheduling issues; is that	18 responsibilities of the upper east side
19 right?	19 region.
20 A Yeah, he may have been aware of	20 Q And the upper east side region, is that
21 working -- as we worked through the	21 the branches you listed earlier, East 92nd,
22 accommodation process, but -- so I imagine he	22 East 85th, East 63rd, East 61st, East 74th,
23 was aware, I believe.	23 East Madison, East 54th?
24 Q What was his -- tell me -- let's talk	24 A That's the current upper east side
25 about the accommodation process generally.	25 region, but those were not the locations that
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1 S. Herrmann	1 S. Herrmann
2 Are there policies and procedures in place for	2 were considered that region at the time that
3 when an employee requests an accommodation?	3 Mr. Gecht was the regional director.
4 A Yeah, so we of course will always look	4 Q What's the -- what is the change?
5 to engage in an accommodation process and look	5 A At the time there have been additional
6 to provide a reasonable accommodation to an	6 locations added to that region since.
7 employee whenever possible.	7 Q Okay. The list I just recited was
8 Q Who is responsible for engaging in that	8 accurate in 2019?
9 dialogue?	9 A No.
10 A It is often the people services	10 Q The list is accurate as of today?
11 representative that supports the location that	11 A Yes.
12 would participate in an accommodation related	12 Q And in 2019, it was smaller?
13 conversation.	13 A Yes.
14 Q So with respect to East 92nd Street, who	14 Q Which locations have been added since
15 is the people services rep that would be --	15 2019?
16 who would be the people services rep that	16 A East 54th Street and E Madison.
17 would handle this dialogue for each 92nd	17 Q Do you know whether anyone opened an
18 Street?	18 investigation into the Sabrina McGeary
19 A Currently?	19 complaints about Maltman?
20 Q Let's start with currently.	20 A Yes, I believe I was the people services
21 A Infinite Sumlin.	21 partner that supported that investigation.
22 Q Okay. And previously -- what about in	22 Q In the interrogatories which maybe we
23 2019?	23 want to -- no, I don't need to make it an
24 A It was me for a portion of 2019 and Paul	24 exhibit. There's a list that we received of
25 Kwan after he stepped into his role.	25 current or former Equinox employees of the
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